

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

IN RE:

CASE NO.: 21-42104-ELM -13

NATALIE ALANA

AKA: NATALIE ALANA RENFRO
3400 SUMMERS DR S
APT 184
FORT WORTH, TX 76137
SSN/TIN: XXX-XX-2963

DEBTOR

HEARING: DECEMBER 2, 2021 AT 8:30 AM

TRUSTEE'S OBJECTION TO CONFIRMATION

TO THE HONORABLE U.S. BANKRUPTCY JUDGE:

NOW COMES Pam Bassel Standing Chapter 13 Trustee and files this Trustee's Objection to Confirmation. Trustee would respectfully show the Court:

The Plan fails to meet the disposable income test of 11 U.S.C. Section 1325 (b) (1) (B) because the Plan does not propose to pay all of the Debtor's disposable income for the applicable commitment period to the Debtor's unsecured creditors.

The Plan provides for an unsecured creditors' pool ("UCP") of \$76,500.00. The Trustee has calculated a UCP of \$109,667.40 based on a monthly disposable income of \$1,827.79 over a 60 month applicable commitment period, with the following add-backs, if any:

FORM 122C-2 LINE 16 TAX WITHHOLDING OVERSTATED PER	349.84
SCHEDULE I LINE 5A	
FORM 122C-2 LINE 23 OPTIONAL TELEPHONE	25.00

The Plan Base proposed by Debtor of \$39,600.00 is insufficient to pay administrative, secured and priority claims, or to pay the unsecured creditors' pool.

WHEREFORE, Trustee prays that confirmation be DENIED and for general relief.

Respectfully submitted,

By: /s/ Ethan S. Cartwright
Ethan S. Cartwright, Staff Attorney
Bar No. 24068273
PAM BASSEL STANDING CHAPTER 13 TRUSTEE
Bar No. 01344800
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North Richland Hills, TX 76180
(817) 916-4710 Phone
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on or before the date of filing. Service was accomplished electronically on Debtor's attorney and all parties entitled to electronic notice and by first class mail on the Debtor and the parties listed below, if any.

By: /s/ Ethan S. Cartwright
Ethan S. Cartwright

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